

Strengthening the Voice of Business

BizFed's Member Alliance
 AIA Los Angeles
 Alhambra Chamber
 American Beverage Association
 Antelope Valley Board of Trade
 Apartment Association, California Southern Cities
 Apartment Association of Greater Los Angeles
 Arcadia Association of Realtors
 Arcadia Chamber
 Asian American Business Women Association
 Asian American Economic Development Enterprise
 Asian Business Association
 Association of Industrial and Commercial Producers
 Assu Chamber
 Bell Gardens Chamber
 Beverly Hills Chamber
 Beverly Hills / Greater LA Association of Realtors
 Burbank Association of Realtors
 Burbank Chamber
 Building Industry Association, LA / Ventura Counties
 Building Owners & Managers Association, Greater LA
 CalAsian Chamber
 California Apartment Association, Los Angeles
 California Business Roundtable
 California Cannabis Industry Association
 California Construction Industry and Materials Association
 California Contract Cities Association
 California Fashion Association
 California Grocers Association
 California Hotel & Lodging Association
 California Independent Bankers
 California Independent Petroleum Association
 California Life Sciences Association
 California Metals Coalition
 California Restaurant Association
 California Small Business Alliance
 California Trucking Association
 CALInnovates
 Carson Dominguez Employers Alliance
 Central City Association
 Century City Chamber
 Citrus Valley Association of Realtors
 Coalition for a Prosperous America
 Community Associations Institute, Los Angeles
 Construction Industry Air and Water Quality Coalitions
 Consumer Healthcare Products Association
 Council on Trade and Investment for Filipino Americans
 Culver City Chamber
 Downey Association of Realtors
 Downtown Long Beach Association
 El Monte/South El Monte Chamber
 Employers Group
 Engineering Contractor's Association
 Entrepreneurs Organization, Los Angeles
 F.A.S.T.-Fixing Angelinos Stuck In Traffic
 Filipino American SEC
 FilmLA
 FuturePorts
 FWD.us
 Gateway to LA
 Glendale Association of Realtors
 Glendale Chamber
 Glendora Chamber
 Greater Los Angeles Auto Show
 Greater Lakewood Chamber
 Greater Los Angeles African American Chamber
 Greater Los Angeles New Car Dealers Association
 Harbor Association of Industry and Commerce
 Harbor City / Harbor Gateway Chamber
 Harbor Trucking Association
 Hollywood Chamber
 Hospital Association of Southern California
 Hotel Association of Los Angeles
 Industry Manufacturers Council
 International Warehouse Logistics Association
 Inglewood Airport Area Chamber
 Irwindale Chamber
 Japan Business Association of Southern California
 LA Canada Flintridge Chamber
 LAX Coastal Area Chamber
 Leadership for Urban Renewal Network
 League of California Cities
 Long Beach Area Chamber
 Los Angeles Area Chamber
 Los Angeles Black MBA Association
 Los Angeles Cleantech Incubator
 Los Angeles County Bicycle Coalition
 Los Angeles County Consumer Affairs
 Los Angeles County Waste Management Association
 Los Angeles Junior Chamber
 Los Angeles Latino Chamber
 Los Angeles Metropolitan Hispanic Chamber
 Malibu Chamber
 Los Angeles Parking Association
 Los Angeles Urban League
 Los Angeles World Affairs Council
 Pacific Palisades Chamber
 Pasadena Chamber
 Pomona Chamber
 Maple Business Council
 Motion Picture Association of America
 MoveLA
 Most Worshipful Hiram Tyre Grand Lodge
 NAACP Southern California Chapter
 National Alliance for Jobs and Innovation
 National Association of Women Business Owners, LA
 Pacific Merchant Shipping Association
 Pasadena-Foothills Association of Realtors
 Recording Industry Association of America
 Redondo Beach Chamber
 Regional Black - San Fernando Valley Chamber
 Regional Hispanic Chamber
 Regional San Gabriel Valley Chamber
 Rosemead Chamber
 Rotary Club of Los Angeles
 San Gabriel Valley Civic Alliance
 San Gabriel Valley Economic Partnership
 Santa Clarita Valley Economic Development Corp.
 San Pedro Peninsula Chamber
 Santa Monica Chamber
 Santa Monica Junior Chamber
 Small Business Action Committee
 Society of Hispanic Professional Engineers - Los Angeles
 South Asian Business Alliance Network
 South Bay Association of Chambers
 South Bay Association of Realtors
 Southern California Golf Association
 Southern California Grantmakers
 Southern California Minority Supplier Development Council Inc.
 Southern California Water Committee
 Southland Regional Association of Realtors
 South Park Stakeholders Group
 Toluca Lake Chamber
 Torrance Area Chamber
 Town Hall Los Angeles
 Tri-Counties Association of Realtors
 United Chambers San Fernando Valley
 Universal City North Hollywood Chamber
 United States-Mexico Chamber
 U.S. Green Building Council/LA
 Valley Economic Alliance
 Valley Economic Development Center
 Valley Industry & Commerce Association
 Valley International Trade Association
 Vernon Chamber
 Vietnamese American Chamber
 Water Replenishment District
 We Care for Humanity
 West Hollywood Chamber
 West Los Angeles Chamber
 West San Gabriel Valley Association
 Western Manufacturers Housing Association
 Westside Council of Chambers
 Western States Petroleum Association
 West Valley/Warner Center Chamber
 Westwood Village Improvement Association
 Wilmington Chamber
 Young Professionals in Energy - LA Chapter
 Youth Business Alliance
 Warner Center Association

January 15, 2016

Pharmaceutical Working Group

c/o Angelo J. Bellomo, REHS, QEP, Deputy Director for Health Protection

5050 Commerce Drive
 Baldwin Park, CA 91706

Re: BizFed Comments on LA County Pharmaceuticals and Sharps Collection and Disposal Stewardship Ordinance

Dear Mr. Bellomo,

On behalf of BizFed, the Los Angeles County Business Federation – a grassroots alliance of 152 top business groups representing 275,000 employers with 3 million employees throughout LA County – we are writing to provide comments on the proposed Los Angeles County Pharmaceuticals and Sharps Collection and Disposal Stewardship Ordinance prior to today's deadline as defined by LA County staff.

We are pleased to count the Los Angeles Department of Public Works among our membership and have a history of win-win collaboration with LA County staff to help deliver good public policy for our region. In that spirit, BizFed members have eagerly participated in numerous meetings run by the County, working in good faith, hoping to effectively, efficiently, and fairly address the underlying problem of ensuring safe disposal of unused medicines and sharps.

Recognizing our shared goal to deliver a program that will actually maximize the safe disposal of unused medicines and sharps, we strongly support the Pharmaceutical & Sharps Safe Disposal Education Initiative developed by industry stakeholders as an alternative to the ordinance proposed by LA County staff. This first of its kind public-private partnership has broad industry support, is based on best practices in the field, and includes performance metrics to ensure it delivers effective outcomes. Moreover, pharmaceutical producers have agreed to be responsible for funding and implementing this multiyear investment at no charge to LA County, patients, consumers, or constituents. Therefore, in addition to being a more effective solution, this plan avoids imposing additional regulatory and compliance costs on businesses and consumers in LA County.

While we support the industry-developed alternative, we understand that there is more work to do and today's comment deadline is one step along the way. Therefore, in anticipation of our continued engagement in this process, we also request access to the studies, repeatedly referenced by LA County consultants, which they claim support the approach contained in the draft ordinance (which focuses on take-back mechanisms, versus consumer education and

behavior.) Throughout the stakeholder engagement process, BizFed members have requested access to these studies, but that has yet to occur. Sharing those studies will help ensure all stakeholders are working from shared information, promoting a more productive process moving forward.

We appreciate the efforts of LA County staff to work with a wide range of stakeholders to develop a proposal that is responsive to the Board of Supervisors. We look forward to continuing working in collaboration to deliver to the people of LA County an effective, efficient, fair solution.

Sincerely,

Gilbert Ivey
BizFed Chair
Former CAO, Metropolitan
Water District of Southern
California

David Fleming
BizFed Founding Chair

Tracy Rafter
BizFed Founding CEO
IMPOWER, Inc.

CC: Mark Pestrella, Chief Deputy Director, LADPW; Pat Proano, Assistant Deputy Director, LADPW; LA County Sheriff Jim McDonnell

Strengthening the Voice of Business November 30, 2015

Chambers of Commerce

Alhambra
Arcadia
Bell Gardens
Beverly Hills
Burbank
Central City Association
Century City
Culver City
El Monte/South El Monte
Glendale
Greater Lakewood
Harbor City / Harbor Gateway
Hollywood
Inglewood Airport Area
Irwindale
La Canada Flintridge
LAX Coastal Area
Long Beach Area
Los Angeles Area
Los Angeles Junior
Malibu
Pacific Palisades
Pasadena
Pomona
Redondo Beach
Regional San Gabriel Valley
Rosemead
San Pedro Peninsula
Santa Monica
Santa Monica Junior
South Bay Association
Toluca Lake
Torrance Area
United Chambers San Fernando Valley
Universal City North Hollywood
United States-Mexico
Vernon
West Hollywood
West Los Angeles
Westside Council
Wilmington
Woodland Hills-Tarzana

Trade Associations

AIA Los Angeles
American Beverage Association
Antelope Valley Board of Trade
Apartment Association, California Southern Cities
Apartment Association of Greater Los Angeles
Arcadia Association of Realtors
Beverly Hills / Greater LA Association of Realtors
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California Trucking Association
Carson Dominguez Employers Alliance
Citrus Valley Association of Realtors
Coalition for a Prosperous America
Community Associations Institute, Los Angeles
Construction Industry Air and Water Quality Coalitions
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Harbor Association of Industry and Commerce
Harbor Trucking Association
Hospital Association of Southern California
Hotel Association of Los Angeles
Industry Manufacturers Council
International Warehouse Logistics Association
Leadership for Urban Renewal Network
League of California Cities
Los Angeles Cleantech Incubator
Los Angeles County Bicycle Coalition
Los Angeles County Waste Management Association
Los Angeles Urban League
Los Angeles World Affairs Council
Motion Picture Association of America
MoveLA
NAIOP Southern California Chapter
National Alliance for Jobs and Innovation
National Association of Women Business Owners, LA
Pacific Merchant Shipping Association
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We Care for Humanity
West San Gabriel Valley Association
Western Manufactured Housing Association
Western States Petroleum Association
Young Professionals in Energy - LA Chapter
Youth Business Alliance

Minority Organizations

Asian American Business Women Association
Asian American Economic Development Enterprise
Asian Business Association
Council on Trade and Investment for Filipino Americans
Filipino American Chamber SEC
Greater Los Angeles African American Chamber
Los Angeles Black MBA Association
Los Angeles Latino Chamber
Los Angeles Metropolitan Hispanic Chamber
Regional Black Chamber - San Fernando Valley
Regional Hispanic Chamber
Society of Hispanic Professional Engineers - Los Angeles
South Asian Business Alliance Network
Southern California Minority Supplier Development Council Inc.
Vietnamese American Chamber

Business Improvement Districts

Gateway to LA
South Park Stakeholders Group
Warner Center Association
Westwood Village Improvement Association

1000 N. Alameda St. #400

Pharmaceutical Working Group
c/o Angelo J. Bellomo, REHS, QEP,
Deputy Director for Health Protection
5050 Commerce Drive
Baldwin Park, CA 91706

Re: Stakeholder Engagement in Development/Consideration of LA County Medicine Take-Back Program

Dear Angelo J. Bellomo,

On behalf of the Los Angeles County Business Federation (BizFed) – representing more than 155 business groups representing 275,000 employers with 3 million employees across our region, we are writing to express our deep concerns with the current medicine take-back program draft ordinance. We are pleased to count Los Angeles Department of Power and Water among our membership and have a **history of win-win collaboration with LA County staff** to help deliver good public policy for our region. **Unfortunately, the draft ordinance does not appear to live up to those standards.**

Business stakeholders have eagerly participated in numerous meetings run by the County, working in good faith, hoping to effectively, efficiently, and fairly address the underlying problem of ensuring safe disposal of prescription and over-the-counter medicines and sharps. However, this draft ordinance seems to totally ignore the input of affected industry stakeholders and basically just duplicates the Alameda County model.

According to the County's own information, this model has only recently been put in place in just three jurisdictions in the United States [Alameda County, City of San Francisco, San Francisco County]. Each of which have thus far failed to be implemented according to plan. In addition, while other *countries* have employed similar models, they have vastly different legal and regulatory constructs that don't necessarily lend themselves to something American jurisdictions can simply duplicate.

We are troubled that the County seems unwilling to consider the win-win approaches business stakeholders have suggested, approaches that are cost effective, consumer friendly, and having a greater chance of actually solving the problem.

Therefore, **we strongly encourage you direct County staff to go back to the drawing board** and collaborate with stakeholders on a solution that is fair, reasonable, practical, and capable of delivering the intended results. BizFed continues to be committed to working with the Department of Public Works to consider all options and proven best-practices to ensure an effective, efficient, and equitable program that addresses the safe disposal of prescription and over-the-counter medicines.

Sincerely,



MC Townsend
BizFed Chair
Regional Black Chamber -
San Fernando Valley



David Fleming
BizFed Founding Chair



Tracy Rafter
BizFed Founding CEO
IMPOWER, Inc.

CC: Mark Pestrella, Chief Deputy Director, LADPW; Pat Proano, Assistant Deputy Director; LA County Sheriff Jim McDonnell